



October 2, 2021

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BY ECF

The Honorable Barbara Moses
United States Magistrate Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 740
New York, NY 10007

MEMO ENDORSED

Re: *Shih v. Petal Card, Inc., et al.*, 18-CV-5495 (JFK) (BCM)

Dear Judge Moses:

We represent Plaintiff Cassandra Shih in the above-referenced action. We write pursuant to Rule 3 of Your Honor's Individual Rules of Practice and ECF Rule 27.7(b) to respectfully request that a letter filed yesterday evening, October 1, 2021 (ECF 221) ("Letter") be formally sealed and that the Court grant permission to re-file under seal portions of Plaintiff's Letter that incorporate information from documents designated Confidential by Defendants.

The basis for the sealing request for ECF 221 is that the Letter was mistakenly filed in unredacted form, and contains material designated as Confidential that Defendants have requested be redacted from the public copy of the Letter. Upon identifying this oversight, we promptly contacted the ECF Help Desk via email, in accordance with ECF Rule 27.7(a), with an emergency sealing request. We also promptly notified counsel for Defendants.

Plaintiff also seeks the Court's permission to re-file under seal portions of the Letter that contain material designated Confidential by Defendants. Pursuant to Individual Rule 3 and ECF Rule 27.7(c), we are filing a redacted version of the Letter simultaneously with this letter motion. We will also file under seal an unredacted copy of the letter with the proposed redactions highlighted. Pursuant to Individual Rule 3, Defendants will follow up within three court days to explain the basis for the proposed sealing.

We regret this inadvertent error, and thank the Court for its prompt attention to this matter.

Respectfully submitted,

/s/ Demetri Blaisdell
Demetri Blaisdell

cc: All counsel via ECF

Application GRANTED. SO ORDERED.

Barbara Moses
United States Magistrate Judge
October 4, 2021

BOIES SCHILLER FLEXNER LLP